



BRUCE R. EWING
Partner
(212) 415-9206
ewing.bruce@dorsey.com

April 1, 2025

VIA ELECTRONIC FILING

The Honorable Lewis A. Kaplan
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Bliss Trademark Holdings, LLC v. Bliss LLC*, No. 25-CV-1763 (LAK)

Dear Judge Kaplan:

We represent Plaintiff Bliss Trademark Holdings, LLC ("Bliss") in the above-referenced matter. We write regarding the Court's March 5, 2025 Order concerning the case schedule and initial pretrial conference, which is currently scheduled for April 8, 2025.

While counsel for Defendant Bliss LLC ("Blissy") has not yet appeared or responded to Bliss's complaint, we have conferred with Blissy's counsel and agreed to the proposed consent scheduling order accompanying this letter. The parties request a discovery schedule longer than the six months from today contemplated by the Court, for two reasons. First, Blissy's response to the complaint, which counsel has advised will take the form of a motion to dismiss, is not due until May 5. Second, the parties believe that expert discovery is likely in this trademark proceeding. In such cases, it is counsel's experience that expert discovery tends to take longer to complete than in other types of proceedings. Accordingly, the accompanying order sets a discovery cutoff date of early January 2026.

Based on the foregoing, the parties respectfully request that the Court so-order the parties' proposed case schedule and cancel the initial pre-trial conference scheduled for April 8, 2025.

Respectfully Submitted,

DORSEY & WHITNEY LLP
/s/ Bruce R. Ewing
Bruce R. Ewing

cc: Karl Kronenberger, Esq. (by electronic mail)
Ginny Sanderson, Esq. (by electronic mail)
Kelly Mulcahy, Esq. (by electronic mail)
Attorneys for Defendant

SO ORDERED

4/2/25